IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY TRENTON VICINAGE

DAVID M. GRECO,

Plaintiff,

Civil Action No. 3:19-CV-19145

V.

GURBIR S. GREWAL, ET AL.,

Defendants.

NOTICE OF MOTION FOR DEFENDANTS GLOUCESTER TOWNSHIP POLICE DEPARTMENT, BERNARD JOHN DOUGHERTY, NICHOLAS C. AUMENDO, DONALD B. GANSKY, WILLIAM DANIEL RAPP AND BRIAN ANTHONY TURCHI TO DISMISS PLAINTIFF'S COMPLAINT UNDER FED. R. CIV. P. 12(B)(6)

ARCHER & GREINER A Professional Corporation One Centennial Square P.O. Box 3000 Haddonfield, NJ 08033-0968 (856) 795-2121

Attorneys for Defendants, Gloucester Township Police Department, Bernard John Dougherty, Nicholas C. Aumendo, Donald B. Gansky, William Daniel Rapp and Brian Anthony Turchi

BY: VINCENT P. SARUBBI, ESQ. KERRI E. CHEWNING, ESQ. DANIEL J. DEFIGLIO, ESQ. TO: Albert J. Rescinio, Esq.
LAW OFFICES OF ALBERT J. RESCINIO, L.L.C.
1500 Allaire Avenue - Unit #101
Ocean Township, New Jersey 07712
Attorneys for Plaintiff David Greco

Bryan Edward Lucas, Esq.
ATTORNEY GENERAL OF NEW JERSEY
124 Halsey Street, 5thFloor
P.O. Box 45029
Newark, NJ 07101
Attorney for Defendants Gurbir S. Grewal, Jared M. Maples, New Jersey
Office of Homeland Security and Preparedness, Camden County
Prosecutor's Office, Jill S. Mayer, and Nevan Soumalis

PLEASE TAKE NOTICE that on June 15, 2020, or as soon thereafter as counsel may be heard, counsel for Defendants Gloucester Township Police

Department ("GTPD") and Gloucester Township Police Officers, Bernard John

Dougherty, Nicholas C. Aumendo, Donald B. Gansky, William Daniel Rapp and

Brian Anthony Turchi ("the Officers") (collectively "the Gloucester Township

Defendants") shall move before the United States District Court for the District of

New Jersey located at 402 E. State St, Trenton, New Jersey 08608, for an Order

granting the Gloucester Township Defendants' Motion to Dismiss Plaintiff's

Complaint in its entirety with prejudice, pursuant to Fed. R. Civ. P. 12(b)(6).

In support of this motion, Gloucester Township Defendants shall rely upon the enclosed Brief. A proposed form of order and Certificate of Service are also enclosed.

Oral Argument is requested if opposition is filed.

Archer & Greiner A Professional Corporation Attorneys for the Gloucester Township Defendants

By: <u>/s/ Daniel J. DeFiglio</u>
VINCENT P. SARUBBI, ESQ.
KERRI E. CHEWNING, ESQ.
DANIEL J. DEFIGLIO, ESQ.

Dated: May 11, 2020 218217683v2